

OSEN LLC

ATTORNEYS AT LAW

WWW.OSENLAW.COM

2 UNIVERSITY PLAZA, SUITE 201, HACKENSACK, NJ 07601
T. 201.265.6400 F. 201.265.0303

345 SEVENTH AVENUE, 21ST FLOOR, NEW YORK, NY 10001
T. 646.380.0470 F. 646.380.0471

October 16, 2015

VIA ECF

Hon. Dora L. Irizarry
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Strauss, et al. v. Crédit Lyonnais, S.A., 06-cv-702 (DLI) (MDG)*
Wolf, et al. v. Crédit Lyonnais, S.A., 07-cv-914 (DLI) (MDG)

Dear Judge Irizarry:

We write on all Plaintiffs' behalf in compliance with Your Honor's October 8, 2015 Order requesting "additional information concerning transfers of money" and Your Honor's request during the companion *Weiss v. National Westminster Bank* case hearing to provide the Court with a list of additional relevant cases discussed during oral argument.

With respect to the number of transfers, we have conferred with defense counsel and have agreed to the following:

1. The parties agree that the available records indicate that there were 5 U.S. Dollar transfers by Crédit Lyonnais at the request of CBSP that cleared through the United States between 1997 and 2004 with a total amount of \$205,000.
2. The parties agree that there were a total of 291 transfers by Crédit Lyonnais at the request of CBSP that Plaintiffs allege Crédit Lyonnais transferred to Hamas-controlled entities or persons between 1996 and 2003 with a total amount of \$3,009,724.04.

Plaintiffs also wish to note 2 additional items that defense counsel object to Plaintiffs presenting to the Court:

1. There was 1 U.S. Dollar transfer that Crédit Lyonnais, at CBSP's request, attempted to clear through the United States in 2001 in the amount of \$25,100, but was blocked by Crédit Lyonnais' New York Branch because of a potential match to a designated terrorist organization.

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2. The available records indicate that between October 2001 and September 2003 Crédit Lyonnais' New York Branch engaged in 9 separate communications regarding CBSP with Crédit Lyonnais in Paris or U.S. government agencies.

Plaintiffs believe that Your Honor should consider these latter 2 items, because as communications concerning a wire transfer passing through this jurisdiction they constitute material further contacts Crédit Lyonnais had with the forum serving as a further basis for the Court to exercise personal jurisdiction.

Regarding Your Honor's request for additional case law, Plaintiffs draw Your Honor's attention to the following:

1. *Orteck Int'l Inc. v. TransPacific Tire & Wheel, Inc.*, No. CIVA DKC 2005-2882, 2006 WL 2572474 (D. Md. Sept. 5, 2006), applying *ESAB Group, Inc. v. Centricut, Inc.*, 126 F.3d 617, 628-29 (4th Cir. 1997).

We are also providing with this letter two exhibits (one of which is being filed under seal) Plaintiffs used during the October 8, 2015 court conference. We thank the Court for its consideration.

Respectfully submitted,

/s/ Gary M. Osen

Encls.

cc: All Counsel